



Santiago J. Teran, Esq.
2125 Biscayne Blvd Ste 206
Miami, FL 33137
E: steran@consumerattorneys.com
C: 347-946-7990
P: 305-433-3252
F: 718-715-1750

May 31, 2023

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
United States District Court for the Southern District of New York
40 Foley Square, Courtroom 1506
New York, NY 10007

RE: *Guerrero, Richard v. Turn Technologies, Inc.*
Case No: 1:23-cv-02483-RA

Dear Judge Abrams,

This firm represents Plaintiff in the above-referenced matter. We write in response to your order (doc. 13) for “proposed next steps”.

Plaintiff is preparing his demand for arbitration and will be filing same within this week. Plaintiff proposes that this case be stayed while arbitration is pending. *Katz v. Celco P’ship*, 794 F.3d 341, 345 (2d Cir. 2015). A stay of this case will conserve judicial resources and may avoid further prosecution if arbitration is resolved without the need of resort to the courts.

We thank Your Honor for considering our proposal.

Respectfully submitted,

/s/ Santiago J. Teran

Santiago J. Teran

Attorney for Plaintiff

Cc: all parties via ECF